

**Green, LindaE**

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**From:** Gaines, Cynthia  
**Sent:** Tuesday, October 25, 2016 3:25 PM  
**To:** FOIA HQ  
**Subject:** FW: Incoming Correspondence from Daniel C. Ward at Campbell Campbell Edwards & Conroy (Dated 14 Oct 16)  
**Attachments:** 17-000-0698.pdf

FYI. Thanks.

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**From:** Gaines, Cynthia  
**Sent:** Tuesday, October 25, 2016 3:24 PM  
**To:** Gottesman, Larry <Gottesman.Larry@epa.gov>  
**Subject:** Incoming Correspondence from Daniel C. Ward at Campbell Campbell Edwards & Conroy (Dated 14 Oct 16)

Please see the attached FOIA request. Thanks.

Cynthia A. Gaines  
Correspondence Specialist  
Office of the Executive Secretariat  
202-564-1788

ONE CONSTITUTION CENTER  
THIRD FLOOR  
BOSTON, MA 02129  
TEL: (617) 241 3000  
FAX: (617) 241 5115

DANIEL C. WARD  
(617) 241-3121

October 14, 2016

RECEIVED  
2016 OCT 25 AM 8:13  
OFFICE OF THE  
EXECUTIVE SECRETARIAT

Keeper of Records  
United States Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington DC 20460

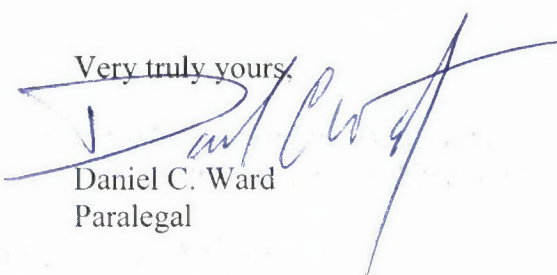
**Re: Edward J. Medairos, Trustee of Beacon Park Realty Trust v. City of  
Brockton v. Veolia Water, North America-Northeast, LLC  
C.A. No.: PLCV2010-505-A**

Dear Sir or Madam,

Our office is involved in the above referenced litigation which stems from alleged flooding incidents that occurred at or near the property located at 855 North Main Street in West Bridgewater, MA. As part of our investigation we are asking the Environmental Protection Agency in accordance with the Freedom of Information Act to please provide us with the documents and materials listed in the attached Schedule A. We will happily reimburse the Agency for any copying charges associated with this request.

If you have any questions or desire clarification on our request, please feel free to contact me at the above telephone number or if you would prefer to email me please use [dward@campbell-trial-lawyers.com](mailto:dward@campbell-trial-lawyers.com). Thank you for your attention to this matter.

Very truly yours,

  
Daniel C. Ward  
Paralegal

Encl.

CC: James M. Campbell, Esq. (w/o encl.)  
Trevor J. Keenan, Esq. (w/o encl.)

## **SCHEDULE A**

The Keeper of Records is requested to produce the following documents and materials:

1. All memos, notes, reports, records and any other materials related to investigations or enforcement actions undertaken by the Environmental Protection Agency (“EPA”) pertaining to the property at 855 North Main Street (known as “Westbridge Landing”), West Bridgewater, MA.
2. All correspondence between the EPA and Edward Medairos, or individuals acting on his behalf, regarding the property located at 855 North Main Street, West Bridgewater, MA.
3. All correspondence between the EPA and the West Bridgewater Conservation Commission, Brockton Conservation Commission, Massachusetts Department of Environmental Protection and any other entity and/or any other entity regarding the property located at 855 North Main Street, West Bridgewater, MA.
4. All Notices of Compliance, citations, fines or reprimands issued by the EPA to Edward Medairos pertaining to the property located at 855 North Main Street, West Bridgewater, MA.
5. Any and all complaints received by the EPA relating to the property located at 855 North Main Street, West Bridgewater, MA and the completed files related to those complaints.
6. Any and all photographs related to any investigations undertaken by the EPA related to the property located at 855 North Main Street, West Bridgewater, MA.
7. The EPA’s file pertaining to the property located at 855 North Main Street, West Bridgewater, MA.
8. All reports, including but not limited to Daily Monitoring Reports submitted by the City of Brockton and/or Veolia Water, North-America-Northeast, Inc. (“Veolia”) for the Brockton Advanced Water Reclamation Facility from 2004 to the present.
9. All correspondence between the EPA and the City of Brockton and/or Veolia regarding the design or operation of the Brockton Advanced Water Reclamation Facility.
10. All correspondence between the EPA and the City of Brockton and/or Veolia regarding any inflow and infiltration issues with the Brockton Sewer System.
11. Any and all complaints received by the EPA related to the Brockton Advanced Water Reclamation Facility and the complete files related to those complaints.
12. The EPA’s file pertaining to the Brockton Advanced Water Reclamation Facility.

13. All water quality studies or investigations of the Salisbury Plain River performed by or on behalf of the EPA or received by the EPA from 2000 to the present.
14. All memorandums, reports, notes, photographs, records or other materials pertaining to any inspections of the Brockton Advanced Water Reclamation Facility from 2000 to the present.

CAMPBELL CAMPBELL EDWARDS & CONROY  
PROFESSIONAL CORPORATION

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BOSTON, MA 02129



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